

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

DON BLANKENSHIP,

Plaintiff

v.

Case No. 2:19-cv-00236

FOX NEWS NETWORK, LLC, et al.,

Defendants.

**NON-PARTY FOX CORPORATION STIPULATION WITH PLAINTIFF DON
BLANKENSHIP**

Plaintiff Don Blankenship (“Mr. Blankenship”) and specially appearing non-party Fox Corporation hereby stipulate as follows:

1. Whereas, on October 12, 2021, Mr. Blankenship served a subpoena (“the Subpoena”) on non-party Fox Corporation for a deposition of its Chairman K. Rupert Murdoch (“Mr. Murdoch”);
2. Whereas Mr. Blankenship has sought the deposition of other deponents (the “Other Potential Deponents”), *see* ECF 1027;
3. Whereas on October 28, 2021, Mr. Blankenship and defendant Fox News Network LLC (“FNN”) entered into a stipulation, *see* ECF 1036;
4. Whereas Mr. Blankenship, Fox Corporation, and Mr. Murdoch wish to resolve these issues to proceed efficiently to resolution; Fox Corporation and Mr. Blankenship hereby stipulate and agree as follows:
5. Plaintiff shall be permitted to depose Mr. Murdoch for 1½ hours of on-the-record time, at a date mutually agreeable between Mr. Blankenship and Mr. Murdoch.
6. The topics of Mr. Murdoch’s deposition shall be limited to the topics sent by Mr. Blankenship’s counsel to Fox Corporation counsel on September 8, 2021, with the additional limitation that Topic #12 (“The corporate culture of Fox News Channel and/or Fox Business Network”) shall be limited to “ethical journalism policies and standards, including, without limitation, accuracy, clarity, fairness, balance, impartiality, independence, and accountability.”

7. Fox Corporation and Mr. Blankenship agree that the filing of this stipulation does not subject Mr. Murdoch or Fox Corporation to the jurisdiction of this Court. *See, e.g.* Dkt. 1000. Fox Corporation and Mr. Murdoch do not consent to, and reserve all rights to object to, personal jurisdiction in the Southern District of West Virginia for any matter, including this matter, and they do not consent to a subpoena for trial, if any, in this or any matter.

In accord with Local Rule 16.1(f)(3), the parties acknowledge that this Stipulation shall not affect the trial date or other deadlines specified in Local Rule 16.1(f)(1).

Dated: October 29, 2021

/s/ Shawn P. George

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